

Planning, Programs and Project
Management Division

Mr. Mike Crouse
National Marine Fisheries Service
Habitat Conservation Division
525 NE Oregon
Portland, Oregon 97232

Dear Mr. Crouse:

We are providing this letter and addendum (Enclosure 1) to confirm specific information previously discussed and provided to your staff after the transmittal of the Biological Assessment (BA), Columbia River Channel Improvements Project, dated December 28, 2001. Where text in the BA has been clarified or added, we make specific reference in the addendum to the section of the BA to aid your review.

Clarifications to the 300-foot habitat buffer, the discharge depth for pipeline dredges, and timeframe for inwater work were required to minimize project related environmental impacts and to allow for implementation of agreed upon ecosystem restoration features. The measure to maintain a 300-foot habitat buffer for upland disposal sites was modified to reference only new upland disposal sites. Otherwise, use of former and present disposal sites would be precluded. These former disposal sites do not have significant fish and wildlife habitat value presently and they are not expected to have such value in the future. If we are unable to use existing disposal sites, our only alternative would be to use previously unimpacted lands for disposal sites, thereby increasing the potential for environmental impacts.

The requirement to maintain the discharge pipe for pipeline dredges below 20' depth would apply to inwater disposal except for ecosystem restoration features and mitigation sites which require raising the riverbed elevation to attain the stated objectives. The ecosystem restoration features have been added by line item to the tables for dredging timeframe to specify when the inwater work would occur for each.

Design and implementation changes for ecosystem restoration features have been addressed in the addendum to further clarify these actions. A table has been included in the addendum that clarifies our determinations for listed species and their Critical Habitats by specific upland or shoreline disposal site and for each ecosystem restoration feature and mitigation site proposed for implementation. An evaluation and determination pertaining to Essential Fish Habitat had been developed and is attached (Enclosure 2).

Letters from the sponsor ports for the channel improvement project are also attached (Enclosure 3). These letters and their attachments provide additional information regarding the Biological Assessment's discussion of potential future port development. Specifically, the letters support the Corps' conclusion that, with the exception of berth deepening at several locations (noted below), potential future port development is not interdependent or interrelated with the channel improvement project, nor is such potential development an indirect or cumulative effect of the project for ESA purposes.

Enclosure 4 contains additional information on Polynuclear Aromatic Hydrocarbons (PAH) and PCBs. The Corps has sorted our database for PAH and PCB and is furnishing an additional 1,300 records for PAHs and 1,062 records for PCBs within the project area. We applied the NMFS threshold values to these data to determine if there are any exceedances for PAH and PCBs. The Corps has determined there are no samples within the navigation channel that exceed the NMFS threshold values. Two areas outside the channel exceed the "Dredged material Evaluation Framework" (DMEF) and/or NMFS concern levels. Specifically, PAHs exceed NMFS values at the Skipanon Channel and PCBs exceed both the DMEF and NMFS values at Vanalco on the Columbia River. However, since these areas are outside the dredging prism, they will not be impacted by the project. These two locations are noted by shaded areas in enclosure 4. Also enclosed is a CD-ROM containing the Corps complete database, as of May 19, 2002.

We consider the clarifications addressed in this letter to be minor in nature and to not constitute a significant change to the conclusions drawn or overall analysis presented in the December 28, 2001 Biological Assessment. Should you have further questions regarding the enclosed information, please contact Robert E. Willis of my staff at 503-808-4760.

Sincerely,

Davis G. Moriuchi
Deputy District Engineer
for Project Management

